

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 25-60066-CR-DAMIAN/VALLE

18 U.S.C. § 1542

18 U.S.C. § 1015(f)

52 U.S.C. § 10307(c)

18 U.S.C. § 982(a)(6)

FILED BY AT D.C.

Mar 20, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - FTL

UNITED STATES OF AMERICA

vs.

ASHLEY R. RIVERS
a/k/a "Ashley Rad Hilliard,"

Defendant.

INDICTMENT

The Grand Jury charges that:

COUNT 1

**False Statement in Application for Passport
(18 U.S.C. § 1542)**

On or about July 16, 2016, in Broward County, in the Southern District of Florida, the defendant,

**ASHLEY R. RIVERS,
a/k/a "Ashley Rad Hilliard,"**

willfully and knowingly made a false statement in an application for a passport with intent to induce and secure for his own use the issuance of a passport under the authority of the United States, contrary to the laws regulating the issuance of such passports and the rules prescribed pursuant to such laws, in that in such application the defendant stated that his legal name was Ashley Rad Hilliard and that he was a United States citizen, which statements he knew to be false, in violation of Title 18, United States Code, Section 1542.

COUNT 2
False Claim of Citizenship in Order to Vote
(18 U.S.C. § 1015(f))

On or about July 14, 2020, in Broward County, in the Southern District of Florida, the defendant,

ASHLEY R. RIVERS,
a/k/a “Ashley Rad Hilliard,”

an alien, knowingly made a false statement and claim that he was a citizen of the United States, in order to register to vote and to vote in a Federal, State and local election, in that he falsely stated and claimed that he was a United States citizen when registering to vote with the office of the supervisor of elections for Broward County, Florida, in violation of Title 18, United States Code, Section 1015(f).

COUNT 3
False Information in Voting
(52 U.S.C. § 10307(c))

On or about October 19, 2020, in Broward County, in the Southern District of Florida, the defendant,

ASHLEY R. RIVERS,
a/k/a “Ashley Rad Hilliard,”

knowingly and willfully gave false information as to his name for the purpose of establishing his eligibility to vote in the general election held solely and in part for the purpose of selecting and electing any candidate for the office of President, Vice President, presidential elector, Member of the United States Senate, and Member of the United States House of Representatives, in that he submitted or caused to be submitted a vote to the supervisor of elections for Broward County, Florida, for the general election held on November 3, 2020, Florida, in violation of Title 52, United States Code, Section 10307(c).

COUNT 4
False Information in Voting
(52 U.S.C. § 10307(c))

On or about November 2, 2024, in Broward County, in the Southern District of Florida,
the defendant,

ASHLEY R. RIVERS,
a/k/a “Ashley Rad Hilliard,”

knowingly and willfully gave false information as to his name for the purpose of establishing his eligibility to vote in the general election held solely and in part for the purpose of selecting and electing any candidate for the office of President, Vice President, presidential elector, Member of the United States Senate, and Member of the United States House of Representatives, in that he submitted or caused to be submitted a vote to the supervisor of elections for Broward County, Florida, for the general election held on November 5, 2024, in violation of Title 52, United States Code, Section 10307(c).

FORFEITURE ALLEGATIONS

1. The allegations of this Indictment are hereby re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America certain property in which the defendants, **ASHLEY R. RIVERS a/k/a “Ashley Rad Hilliard,”** have an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1542, as alleged in this Indictment, the defendant so convicted shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(6), in the following property:

(a) any conveyance, including any vessel, vehicle, or aircraft used in the commission of such violation; and

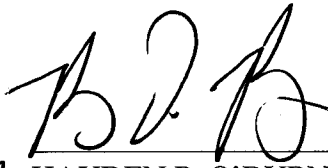
(b) any property, real or personal –

(1) that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of such violation; or

(2) that was used to facilitate, or was intended to be used to facilitate, the commission of such violation.

3. All pursuant to Title 18, United States Code, Section 982(a)(6), and the procedures set forth at Title 21, United States Code, Section 853, as made applicable by Title 18, United States Code, Section 982(b)(1).

FOREPERSON


for HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY


CHRISTOPHER KILLORAN
ASSISTANT UNITED STATES ATTORNEY

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

UNITED STATES OF AMERICA

CASE NO.: 25-60066-CR-DAMIAN/AOV

v.

Ashley R. Rivers
a/k/a "Ashley Rad Hilliard"

CERTIFICATE OF TRIAL ATTORNEY

Defendant.

Court Division (select one)

☐ Miami ☐ Key West ☐ FTP
☒ FTL ☐ WPB

Superseding Case Information:

New Defendant(s) (Yes or No) _____

Number of New Defendants _____

Total number of new counts _____

I do hereby certify that:

1. I have carefully considered the allegations of the Indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.
3. Interpreter: (Yes or No) No
List language and/or dialect: _____
4. This case will take 3 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)	(Check only one)
I <input checked="" type="checkbox"/> 0 to 5 days	<input type="checkbox"/> Petty
II <input type="checkbox"/> 6 to 10 days	<input type="checkbox"/> Minor
III <input type="checkbox"/> 11 to 20 days	<input type="checkbox"/> Misdemeanor
IV <input type="checkbox"/> 21 to 60 days	<input checked="" type="checkbox"/> Felony
V <input type="checkbox"/> 61 days and over	
6. Has this case been previously filed in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
7. Has a complaint been filed in this matter? (Yes or No) No
If yes, Judge _____ Magistrate Case No. _____
8. Does this case relate to a previously filed matter in this District Court? (Yes or No) No
If yes, Judge _____ Case No. _____
9. Defendant(s) in federal custody as of _____
10. Defendant(s) in state custody as of _____
11. Rule 20 from the _____ District of _____
12. Is this a potential death penalty case? (Yes or No) No
13. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? (Yes or No) No
14. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? No
15. Did this matter involve the participation of or consultation with Magistrate Judge Marty Fulgueira Elfенbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? No
16. Did this matter involve the participation of or consultation with Magistrate Judge Ellen F. D'Angelo during her tenure at the U.S. Attorney's Office, which concluded on October 7, 2024? No

By: _____

Christopher Killoran

Assistant United States Attorney

FL Bar No.

27999

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: Ashley R. Rivers a/k/a "Ashley Rad Hilliard"

Case No: _____

Count #: 1

False Statement in Application for a Passport

18 U.S.C. § 1542

* **Max. Term of Imprisonment:** 10 years

* **Mandatory Min. Term of Imprisonment (if applicable):** n/a

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

Count(s) #: 2

False Claim of Citizenship in Order to Vote

18 U.S.C. § 1015(f)

* **Max. Term of Imprisonment:** 5 years

* **Mandatory Min. Term of Imprisonment (if applicable):** n/a

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$250,000

Count(s) #: 3

False Information in Registering or Voting

52 U.S.C. § 10307(c)

* **Max. Term of Imprisonment:** 5 years

* **Mandatory Min. Term of Imprisonment (if applicable):** n/a

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$10,000

***Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.**

Count(s) #: 4

False Information in Registering or Voting

52 U.S.C. § 10307(c)

* **Max. Term of Imprisonment:** 5 years

* **Mandatory Min. Term of Imprisonment (if applicable):** n/a

* **Max. Supervised Release:** 3 years

* **Max. Fine:** \$10,000

*Refers only to possible term of incarceration, supervised release and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.